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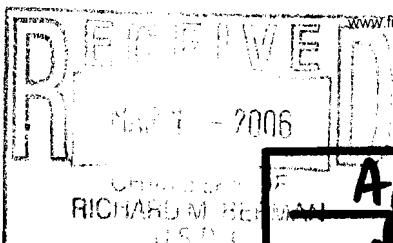
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Application respectfully
denied. As I understand
it, the "Assets" are the basis
for the Court's
jurisdiction.

OUR REF: 81-06/MEU

SO ORDERED:
Date: 3/2/06

Richard M. Berman

Richard M. Berman, U.S.D.J.

Re: Qatar Shipping Co. Q.S.C. v. Totalmar Navigation Corp.
06 CIV 1241 (RMB)

Dear Judge Berman:

We represent Plaintiff Qatar Shipping and write to request an adjournment of the Initial Conference currently scheduled for March 28, 2006 at 9:30 a.m. and for the modification of the scheduling order so as to permit Plaintiff to comply with the Order after service of the attachment. This is our first request for such relief.

This matter involves a claim by Qatar Shipping against Totalmar for breach of a maritime contract of charter party. Qatar Shipping's Verified Complaint included a request for an attachment pursuant to Supplemental Rule B of the Federal Rules of Civil Procedure, and contemporaneously with the filing of the Verified Complaint, Qatar Shipping applied for relief pursuant to Rule B, which was granted *ex parte* on February 16, 2006.

Qatar Shipping has thus far been unable to locate and restrain any property of Defendant Totalmar within this District, but efforts to do so are continuing. If we were to notify our adversaries of these proceedings now, though – before any property is restrained – it would defeat the purpose for which the attachment was sought and this Court's Order issued.

We therefore respectfully request that we be permitted to serve our adversaries their copy of the scheduling order after serving the Notice of Attachment required by ~~USDC CIVIL~~ Rule B.2 and we respectfully request that the Initial Conference be adjourned for 30 days.

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The Hon. Richard M. Berman
February 28, 2006
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We thank the Court for its consideration of this request.

Respectfully submitted,

FREEHILL HOGAN & MAHAR LLP

Michael E. Unger

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